

This petition, filed by a coalition of organizations serving people who are deaf and hard-of-hearing, clearly and appropriately raises a number of issues that the Commission should address through a Notice of Proposed Rulemaking as soon as possible. The closed captioning rules, promulgated by the Commission pursuant to the Telecommunications Act, have been successfully implemented only to a point, with gaps that must now be addressed. A large public record has been established and the elements that can and should be corrected have been well-documented in the TDI petition. Those points include a necessary reformation of the complaint process; a heightened monitoring, compliance reporting and enforcement process; and the establishment of minimum standards for completeness, accuracy, readability and synchronicity of captions, including non-technical quality standards.

Until the above issues are addressed, the Commission will not have completed its job in establishing the captioning mandates created by Congress in the Telecommunications Act. We look forward to participating in a rulemaking process that will establish important updates and changes to the Commission's captioning rules.